

# Exhibit B



Rachel Ann Niedzwiadek &lt;rachelann@ilawco.com&gt;

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## Re: Activity in Case 7:20-cv-09346-NSR Saladino, MD v. Frank Tufano Default Judgment

1 message

**David D. Lin** <david@ilawco.com>

Wed, Feb 26, 2025 at 6:48 PM

To: Farrukh Nuridinov <nuridinov.law@gmail.com>  
Cc: Rachel Ann Niedzwiadek <rachelann@ilawco.com>

Farrukh,

It has come to our attention that the following videos about Dr. Saladino are still available online:

<https://www.youtube.com/live/b6M0cJNYUC4?feature=shared&t=803>  
<https://www.youtube.com/watch?v=egJv2nLFK3Q&t=1763s>  
<https://www.youtube.com/watch?v=rnmkn-Mo69M&t=27s>  
[https://www.youtube.com/watch?v=z1x2N-LG\\_80&t=174s](https://www.youtube.com/watch?v=z1x2N-LG_80&t=174s)  
<https://www.youtube.com/watch?v=kpGhQlyHYkA&t=273s>  
<https://www.youtube.com/watch?v=EmDLrEHiyag&t=58s>

As you know, under the court order Mr. Tufano is "directed to forthwith remove and delete all of the defamatory videos on Defendant's YouTube channel related to Plaintiff." (emphasis added). This is not limited to those videos referenced in the complaint, but includes all videos, such as ones he posted about Dr. Saladino after the complaint was filed. In addition, Mr. Turfano is prohibited from "making public statements referencing that Plaintiff copied, plagiarized, stole or otherwise improperly used Defendants' or any other third party's work; engages in dishonest practices in connection with his business, trade, or profession; abuses prescription or illegal drugs; improperly or illegally manipulates social media posts; or engages in any inappropriate sexual activity."

Please direct your client to delete the referenced videos, along with any other videos that reference Dr. Saladino, within 24 hours, and please confirm that your client has complied. If he refuses to do so, we will move forward with seeking contempt sanctions.

Regards,  
David Lin



**David D. Lin**  
Lewis & Lin LLC  
77 Sands Street, 6th Floor | Brooklyn, NY 11201  
office (718) 243-9323 | fax (718) 243-9326 | direct (718) 243-9325  
[iLawco.com](http://iLawco.com) | [TrademarkAttorneys.com](http://TrademarkAttorneys.com) | [Defamation.nyc](http://Defamation.nyc)

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On Mon, Feb 17, 2025 at 3:53 PM Farrukh Nuridinov <nuridinov.law@gmail.com> wrote:  
working on it.

On Mon, Feb 17, 2025 at 3:52 PM David D. Lin <david@ilawco.com> wrote:  
Farrukh--

Mr. Tufano must remove and permanently delete the Youtube videos. It has been over two weeks since the court order and your client is not in compliance. We have contacted YouTube about the order and they have made the

videos inaccessible in the U.S., but the videos are still online and accessible outside of the U.S. or with a VPN. Please have your client fully delete the videos within 24 hours and confirm same, or we will seek contempt sanctions.

Regards,  
David Lin

**LEWIS & LIN LLC**  
**►►► INTERNET LAW COUNSEL**

**David D. Lin**

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On Mon, Feb 10, 2025 at 5:30 PM Farrukh Nuridinov <nuridinov.law@gmail.com> wrote:

Mr. Lin

My client is willing to comply with the order. What exactly do you want from him? He does not have any money. He has become destitute.

On Fri, Jan 31, 2025 at 4:50 PM David D. Lin <david@ilawco.com> wrote:

Farrukh,

Please advise when your client intends to comply with the court order. As of today, the referenced YouTube videos are still up. Please also contact the domain name registrar to effect an immediate transfer of the domain name.

Regards,  
David Lin

**LEWIS & LIN LLC**  
**►►► INTERNET LAW COUNSEL**

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----- Forwarded message -----

From: <NYSD\_ECF\_Pool@nysd.uscourts.gov>

Date: Thu, Jan 30, 2025 at 2:23 PM

Subject: Activity in Case 7:20-cv-09346-NSR Saladino, MD v. Frank Tufano Default Judgment

To: <CourtMail@nysd.uscourts.gov>

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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U.S. District Court

Southern District of New York

## Notice of Electronic Filing

The following transaction was entered on 1/30/2025 at 2:22 PM EST and filed on 1/30/2025

**Case Name:** Saladino, MD v. Frank Tufano

**Case Number:** 7:20-cv-09346-NSR

**Filer:**

**Document Number:** 59

### Docket Text:

**ORDER OF DEFAULT: ORDERED, ADJUDGED AND DECREED:** That Plaintiff is hereby entitled to and is granted a Judgment of Default as to each and every claim as against each named Defendant Frank Tufano and Frankies Free-Range Meat, LLC, on the issue of liability; **ORDERED, ADJUDGED AND DECREED:** That Defendants shall forthwith or within a reasonable time permanently transfer the Domain Name <PAULSALADINO.COM> to Plaintiff; **ORDERED ADJUDGED AND DECREED:** That Defendants are enjoined from making public statements referencing that Plaintiff copied, plagiarized, stole or otherwise improperly used Defendants' or any other third party's work; engages in dishonest practices in connection with his business, trade, or profession; abuses prescription or illegal drugs; improperly or illegally manipulates social media posts; or engages in any inappropriate sexual activity; **ORDERED ADJUDGED AND DECREED:** That Defendants are directed to forthwith remove and delete all of the defamatory videos on Defendant's YouTube channel related to Plaintiff, as further set forth. **ORDERED, ADJUDGED AND DECREED:** The parties are directed to contact the Chambers of the Honorable Judge Judith C. McCarthy for the purpose of scheduling a hearing and issuing a Report and Recommendation on an assessment of damages, including compensatory and statutory damages, reasonable attorney's fees and cost. SO ORDERED. (Signed by Judge Nelson Stephen Roman on 1/30/2025) (mml)

### 7:20-cv-09346-NSR Notice has been electronically mailed to:

David Dong Ann Lin [david@ilawco.com](mailto:david@ilawco.com), [7991730420@filings.docketbird.com](mailto:7991730420@filings.docketbird.com), [docketing@ilawco.com](mailto:docketing@ilawco.com)

Farrukh Nuridinov [nuridinov.law@gmail.com](mailto:nuridinov.law@gmail.com)

### 7:20-cv-09346-NSR Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

**Document description:** Main Document

**Original filename:** n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=1/30/2025] [FileNumber=32490112-0] [6cca4d307b169b8db698886b05c52da9e077b472c3c91aa22ea11d5df7981e269cb6736384f240df72a3b391a23257150611b6ac32fc825a645ea819201eb497]]